

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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AMERICAN CIVIL LIBERTIES UNION,	)
et al.,	)
	)
Plaintiffs.	)
	)
v.	) Civil Action No.
	) 98-CV-5591
ALBERTO R. GONZALES, in his official	)
capacity as Attorney General of	)
the United States.	)
	)
Defendant.	)
	)
	)

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JOINT REPORT REGARDING THE DISCOVERY  
AND MAINTENANCE OF ELECTRONIC INFORMATION  
INCLUDING COMPUTER BASED AND DIGITAL INFORMATION

The parties, by their undersigned counsel and pursuant to paragraph 4 of Pretrial Order No. 14 (Case Management Order), hereby submit the following joint report.

The parties have met and discussed the issue of discovery and maintenance of electronic information including computer based and digital information. The sole issue identified at this time is defendant's concern with the preservation of plaintiffs' web sites. Defendant has proposed to resolve this issue by utilizing commercial software such as that provided by bluesquirrel.com, an Internet software provider, and archive.org, a digital library of Internet web sites, to obtain a snapshot of plaintiffs' web sites at a specific point in time. Defendant is in the process of determining whether bluesquirrel.com and

archive.org software will effectively permit the downloading of plaintiffs' entire web sites.

The parties propose submitting a joint report or stipulation regarding the preservation of plaintiffs' web sites by July 15, 2005.

**FOR THE PLAINTIFFS**

/S/ \_\_\_\_\_ DATE: June 15, 2005

CHRISTOPHER A. HANSEN

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**FOR THE DEFENDANT**

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/s/ Raphael O. Gomez \_\_\_\_\_ DATE: June 15, 2005

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